



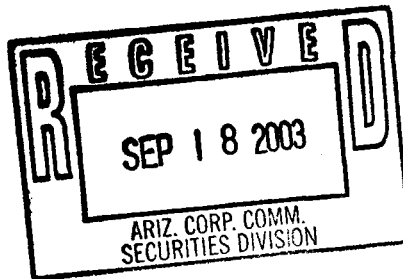
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BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner



In the matter of:

) DOCKET NO. S-03465A-02-0000

VICTOR MONROE STOCKBRIDGE
[CRD # 1233627], and
G. IRENE STOCKBRIDGE
[Husband and Wife]

) STIPULATION FOR PROTECTIVE ORDER

Arizona Corporation Commission

DOCKETED

61 Rufous Lane
Sedona, Arizona 86336-7117

OCT 14 2003

DOCKETED BY

Respondents.

The Securities Division of the Arizona Corporation Commission, and Respondents Victor M. and G. Irene Stockbridge, through their attorneys of record, stipulate to the following conditions for obtaining and using confidential records produced by the Arizona Department of Economic Security – Adult Protective Services regarding the medical condition of Susan N. Coleman, who is the injured party in this action:

1. The Division will provide the confidential records produced by the Arizona Department of Economic Security – Adult Protective Services to the attorneys for the Respondents, Paul J. Roshka or Dax R. Watson for use in this case. The Division will release these documents (Division Bates Numbers ACC04281-4331 and Division Bates Numbers ACC05311-5317) within five days of the entry of a protective order.

1 2. These records will be distributed only to the parties, the attorneys of record for the parties,
2 persons regularly in the employment of the attorneys, and persons who are engaged as testifying or
3 consulting experts, but only after they have executed the nondisclosure agreement attached as
4 Exhibit A.

5
6 3. The dissemination of these records, or any information contained in them, is prohibited,
7 except to those individuals described in paragraph 2. Any individual who is provided a copy of
8 these medical records, or any information contained in them, may discuss the contents of the
9 records only with the attorneys of record.

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12 4. If Respondents wish to disclose these records to any individual other than those described
13 in paragraph 2, their attorney will first inform the Division. If the Division does not consent to the
14 disclosure, then Respondents may move for modification of the Commission's protective order.

15
16 5. When Respondents provide copies of, or information from, these records to a person listed
17 in paragraph 2, the party will require the recipient to execute the nondisclosure agreement attached
18 as Exhibit A. Respondents will maintain all original nondisclosure agreements executed under this
19 stipulation and provide copies of all executed nondisclosure agreements to the attorney of record
20 for the Division, except for those of the consulting experts.


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23 6. Nothing in this stipulation will preclude either party from offering into evidence at trial or
24 hearing any medical records or information contained in them.

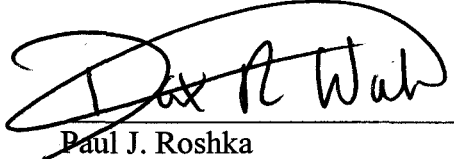
1 7. If the parties attach any part of these records to any pleading filed with the Commission or
2 divulge information obtained from them in any pleading filed with the Commission, the pleadings
3 containing the information will be filed under seal.

4
5 8. This stipulation is effective on the date it is signed by all parties.

6
7 Date: SEPT. 18, 2003

8 Date: Sept 15, 2003

9
10 
11 Mark Dinell
12 John R. Proper
13 **Attorneys for:**
14 Arizona Corporation Commission
15 Securities Division

16 
17 Paul J. Roshka
18 Dax R. Watson
19 **Attorneys for:**
20 Respondents
21 Victor M. and G. Irene Stockbridge

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Exhibit A

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

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3 WILLIAM A. MUNDELL

Chairman

4 JIM IRVIN

Commissioner

5 MARC SPITZER

Commissioner

6
7 In the matter of:

) DOCKET NO. S-03465A-02-0000

8 VICTOR MONROE STOCKBRIDGE

) **NONDISCLOSURE AGREEMENT**

[CRD # 1233627], and

9 G. IRENE STOCKBRIDGE

[Husband and Wife]

10 61 Rufous Lane

11 Sedona, Arizona 86336-7117

12 Respondents.

13 I have received and read a copy of the Commission's protective order in this case. I
14 understand that by receiving the Arizona Department of Economic Security – Adult Protective
15 Services confidential records concerning Susan N. Coleman or the information contained in them, I
16 am subject to the protective order. I agree to the terms of this nondisclosure agreement as well as
17 to the terms of the protective order.
18

19 I agree that distribution of Susan N. Coleman's records, or dissemination of information
20 contained in them, is prohibited, except as necessary to discuss with the attorneys of record in this
21 case.

22 I agree that I will not disseminate Susan N. Coleman's records or any report, summary of
23 expected testimony, or written opinion based on these medical records, except to the attorneys of
24 record in this case. I agree to deliver any report, summary of expected testimony, or written
25
26

1 opinion in a sealed envelope clearly marked "Confidential Information Subject to Commission
2 Order."

3 I understand that the original of this nondisclosure agreement will be retained by the
4 attorney of record for the Respondents Victor M. and G. Irene Stockbridge and that a copy of this
5 agreement will be sent to the attorney of record for the Securities Division of the Arizona
6 Corporation Commission.

7
8 Date: _____, 200__

Signature: _____

9 Name: _____

10 Address: _____

11 Telephone: _____

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13 N:\ENFORCE\CASES\Stockbridge.ajl\PLEADING\9-5-03 Protective Order\Nondisclosure Agreement-Exhibit A.doc
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1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2
3 WILLIAM A. MUNDELL

Chairman

4 JIM IRVIN

Commissioner

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Commissioner

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7 In the matter of:

) DOCKET NO. S-03465A-02-0000

8 VICTOR MONROE STOCKBRIDGE

[CRD # 1233627], and

9 G. IRENE STOCKBRIDGE

[Husband and Wife]

10 61 Rufous Lane

11 Sedona, Arizona 86336-7117

12 Respondents.

) **ORDER ON THE PARTIES' STIPULATED**
) **PROTECTIVE ORDER**

13 The parties having filed a Stipulation for Protective Order ("Stipulation") regarding the
14 medical records of the investor and good cause appearing,

15 IT IS HEREBY ORDERED that:

- 16 (A) Any information produced concerning the matters covered by the Stipulation will be sealed.
- 17 (B) Distribution and disclosure of the discovery concerning the matters covered by the
18 Stipulation is limited to the parties, the attorneys of record for the parties, persons regularly
19 in the employment of the attorneys, and persons who are engaged as testifying or consulting
20 experts, but only after they have executed the nondisclosure agreement attached as Exhibit
21 A to the Stipulation.
- 22 (C) The use of the confidential records produced by the Arizona Department of Economic
23 Security – Adult Protective Services (Division Bates Numbers ACC04281-4331 and
24 Division Bates Numbers ACC05311-5317) is restricted to this case.

23 SIGNED on _____, 2003.

25 _____
26 Marc E. Stern
Administrative Law Judge